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11 Attorneys for Defendant  
GOOGLE INC.

12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14 SAN FRANCISCO DIVISION

15 ORACLE AMERICA, INC.,  
16 Plaintiffs,  
17 v.  
18 GOOGLE INC.,  
19 Defendant.

Case No. 3:10-cv-03561 WHA

**DECLARATION OF RENNY HWANG IN  
SUPPORT OF ORACLE'S  
ADMINISTRATIVE MOTION TO SEAL  
(ECF 2046)**

Dept. Courtroom 8, 19<sup>th</sup> Fl.  
Judge: Hon. William Alsup

1 I, RENNY HWANG, declare as follows:

2 1. I am an attorney employed by Google Inc. ("Google"), where I have served as  
3 senior litigation counsel for the last six years. My job responsibilities include, but are not limited  
4 to, supervising our outside counsel in connection with litigation matters (such as this one), as well  
5 as familiarizing myself with the areas of Google's businesses and documentation concerning  
6 those businesses as they relate to litigation matters under my supervision. I submit this  
7 declaration in support of Oracle's Administrative Motion to File Under Seal. *See* ECF No. 2046.  
8 I have knowledge of the facts set forth herein, and if called upon as a witness, I could testify to  
9 them competently under oath.

10 2. I have reviewed Oracle's Response and Objection to ECF 2036 ("Oracle's ECF  
11 2036 Response") and Exhibits 1 and 2 to the Declaration of Annette Hurst Per ECF 2036. *See*  
12 ECF No. 2043, 2046-2, 2046-4. Portions of Oracle's ECF 2036 Response contain highly  
13 sensitive and confidential information regarding Google's internal business strategy and on-going  
14 product development plans:

15 • **Oracle's ECF 2036 Response:** 10:9 (quoted deposition material), 10:4-6  
16 (quoted deposition material).

17 3. I have also reviewed Exhibit 1, the entire transcript of the deposition of Felix Lin,  
18 Volume I dated December 14, 2015 and Volume II, dated December 18, 2015, and Exhibit 2, the  
19 entire transcript of the deposition of Hiroshi Lockheimer, dated December 8, 2015. The majority  
20 of the deposition testimony in Exhibits 1 and 2 was designated Highly Confidential-Attorneys  
21 Eyes Only and is not relied upon by either party in its respective post-trial briefing. Nor was this  
22 testimony introduced at trial. The following portions of Exhibit 1 and 2 reflect confidential  
23 information regarding Google's and Android's internal financial statements, agreements with  
24 third parties, and Google's internal business strategy and on-going product development plans.

25 • **Exhibit 1:** 12:7-24, 13:25-19:1, 20:1-25, 22:3, 22:15-24:14, 25:1-22,  
26 27:15-28:25, 37:22-39:16, 47:3-54:24, 59:14-60:6, 64:18-73:5, 75:10-18, 79:21-81:1,  
27 100:4-101:20, 102:2-103:14, 104:9-22, 105:3-16, 107:3-109:9, 114:17-115:16, 122:18-  
28 123:2, 124:12-135:13, 137:12-21, 138:9-25, 144:7-21, 145:22-152:5, 152:23-154:11,

156:13-18, 157:12-158:6, 158:13-21, 161:16-162:23, 165:13-166:6, 171:13-178:8, 196:4-197:5, 197:23-199:9, 199:24-200:23, 202:9-25, 205:12-216:7, 216:17-237:7, 238:8-254:10, 258:11-278:13, 278:24-298:9, 300:9-16.

- **Exhibit 2:** 7:18-23:10, 23:17-26:11, 26:18-67:25, 70:8-10, 71:1-94:16, 95:7-17, 95:25-96:10, 96:23-98:10, 99:10-100:2, 101:15-25, 102:4-13, 103:4-190:23, 191:21, 197:12-25, 199:1-355:22, 359:6-368:3.

4. Google keeps the information identified in paragraphs 2 and 3 confidential and public disclosure of this information would provide a competitive advantage to Google's competitors and could have negative effects on Google's business. In particular, public disclosure of on-going product development information could allow competitors access to confidential information regarding Google's ongoing business plans.

5. The above-listed portions of Oracle's ECF 2036 Response and Exhibits 1 and 2 should therefore be sealed.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct to the best of my knowledge.

Executed this 29th day of August, 2016 at Sunnyvale, California.

By:



RENNY HWANG